

Timothy E. Warriner (SB#166128)  
Attorney at Law  
455 Capitol Mall, Suite 802  
Sacramento, CA 95814  
tew@warrinerlaw.com  
(916) 443-7141

Roberto Marquez, SB#131195  
Attorney at law  
613 D St.  
Marysville, CA 95901  
(530) 749-8766

Attorney for Defendant,  
Lucila Calderon

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:25-cr-00094 WBS
	)	
Plaintiff,	)	STIPULATION AND ORDER
	)	CONTINUING THE STATUS
vs.	)	CONFERENCE AND EXCLUDING TIME
	)	UNDER THE SPEEDY TRIAL ACT;
ANTONIO GUZMAN TOLENTINO, and	)	FINDINGS AND ORDER
	)	
LUCILA BACILO CALDERON,	)	
	)	
Defendants.	)	

**STIPULATION**

The government, on behalf of Special United States Attorney Caily Nelson, Antonio Guzman Tolentino, represented by attorney Dina Santos, and Lucila Bacilo Calderon, represented by attorneys Timothy E. Warriner and Roberto Marquez, hereby stipulate and agree to the following:

1. This matter will be continued to December 15, 2025, for a status conference and time will be excluded from September 15, 2025, to December 15, 2025, pursuant to 18

1 U.S.C. § 3161(h)(7)(A), B(iv) (Local Code T4), to allow for preparation of defense  
2 counsel.

3 a. On July 18, 2025, a superseding indictment was filed naming both Mr. Tolentino  
4 and Ms. Calderon. Ms. Santos made an initial appearance on behalf of Mr.  
5 Tolentino on July 29, 2025.

6 b. The government has produced, on or about April 24, 2025, documentary  
7 discovery materials of approximately 30 kilobytes, in addition to audio/video  
8 discovery. On or about August 15, 2025, discovery pages 00120 through 00432  
9 were produced. Defense counsel are now reviewing the discovery materials and  
10 are conducting investigations concerning possible defenses and defense witnesses.  
11

12 c. The government does not object to the continuance and to the proposed exclusion  
13 of time.

14 d. Based on the above-stated findings, the ends of justice served by continuing the  
15 case as requested outweigh the interests of the public and of Mr. Tolentino and  
16 Ms. Calderon in a trial within the time prescribed by the Speedy Trial Act.

17 e. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
18 *et seq.*, within which trial must commence, the time period of September 15,  
19 2025, to December 15, 2025, inclusive, is deemed excludable pursuant to 18  
20 U.S.C. § 3161(h)(7)(A), B(iv) (Local Codes T4) because it results from a  
21 continuance granted by the court at defendant's request on the basis of the court's  
22 finding that the ends of justice served by taking such action outweigh the best  
23 interest of the public and the defendant in a speedy trial.  
24  
25  
26

f. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

DATED: September 10, 2025 /s/ Timothy E. Warriner, Attorney for defendant,  
Lucila Bacilio Calderon

DATED: September 10, 2025 /s/ Roberto Marquez, Attorney for defendant, Lucila  
Bacilio Calderon

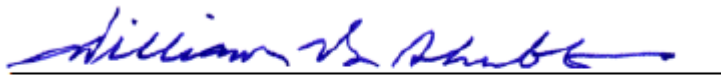
DATED: September 10, 2025 /s/ Dina Santos, Attorney for defendant, Antonio  
Guzman Tolentino

DATED: September 10, 2025 /s/ Caily Nelson, Special United States Attorney, for  
the government

ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference for Antonio Guzman Tolentino and Lucila Bacilo Calderon previously scheduled for September 15, 2025, is continued to **December 15, 2025, at 10:00 a.m.**, and time is excluded between September 15, 2025, and December 15, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) (Local Code T4).

Dated: September 11, 2025

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE